UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 2046

Office of Chemical Safety and Pollution Prevention

ACCELERATED REVIEW FOR BIOCHEMICAL BIOPESTICIDE PRODUCT CHEMISTRY CORROSION CHARACTERISTICS (OCSPP 830.6320)

EPA Reg. or File Symbol No.	67702-54
Chemical Class	Biochemical
PC Code	128919 / 128955
CAS No.	124-07-2 / 334-48-5
Case No.	00144124
Decision No.	566518
Submission No.	1057254
MRID No.	51283301

Nicholas Thomas Digitally signed by Nicholas Thomas Date: 2020.12.15 09:36:34 -05'00'

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REGISTRANT	W. Neudorff GMBH KG
REGISTRANT'S REPRESENTATIVE	Walter G. Talarek; Law Offices of Walter G. Talarek, PC

Table 2. Corrosion Characteristics of Fireworxx 80 (*44% caprylic acid/ 36% capric acid*)

Sampling Interval	Visual Observations (Product)	Visual Observations (Container)
Initial	No discoloration or phase separation	No cracking, deformation, or discoloration
3 Months	No discoloration or phase separation	No cracking, deformation, or discoloration
6 Months	No discoloration or phase separation	No cracking, deformation, or discoloration
9 Months	No discoloration or phase separation	No cracking, deformation, or discoloration
12 Months	No discoloration or phase separation	No cracking, deformation, or discoloration

METHODOLOGY: The storage and stability data requirement (OCSPP 830.6317) for Fireworxx 80 was previously satisfied (DP 449162 2/26/2019 MRID 50687001). The current submission addresses the corrosion characteristics data requirements (OCSPP 830.1620) and as such, utilizes observational rather than analytical methods. The samples were stored in fluorinated high-density polyethylene (fHDPE) containers, the same type of containers in which they will be commercially packaged. The study duration was one-year in duration and corrosion observations were conducted at 0, 3, 6, 9, and 12 months. For additional details regarding methodology, sample preparation, measurements, and calculations see MRID 51283301*, pp. 6-13*.

CONCLUSIONS: Fireworxx 80; Registration # 67702-54 demonstrated no phase separation or color changes in the product and no cracking, deformation, or discoloration in/on any of the containers. Due to switching the intended packaging material from HDPE to fHDPE, the registrant should amend all relevant product chemistry data to indicate this change. Furthermore, since the storage and stability data requirements were previously satisfied using the original HDPE containers rather than the new fHDPE ones, the registrant should address how the container change is expected to affect the previous storage and stability data findings. Corrosion characteristics data are considered **ACCEPTABLE.**

cc: N. Thomas, James Parker, Documentum, Salesforce
Nicholas Thomas, Biologist, FT, PY-S, 12/14/2020